

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

REFINERIA DI KORSOU N.V.,

Plaintiff,

v.

Civil Action No. 1:23-cv-04974

PETRÓLEOS DE VENEZUELA S.A.,

Defendant.

**DECLARATION OF CLAIRE A. DELELLE
IN SUPPORT OF PETRÓLEOS DE VENEZUELA S.A.’S
MOTION TO VACATE DEFAULT JUDGMENT AND DISMISS WITH PREJUDICE**

1. My name is Claire DeLelle and I am a partner with the law firm of White & Case LLP. I am a member in good standing of the New York bar and the U.S. District Courts for the Southern and Eastern Districts of New York, among other courts.

2. White & Case LLP has been engaged by the Ad Hoc Board of Directors (the “Ad Hoc Board”) of Petróleos de Venezuela S.A. (“PDVSA”) to represent PDVSA’s interests in the above-captioned action. I respectfully submit this declaration in support of PDVSA’s Motion to Vacate Default Judgment and Dismiss with Prejudice.

3. Attached as **Exhibit 1** is a true and correct copy of the official statement from President Donald J. Trump recognizing Venezuelan National Assembly President Juan Guaidó as the Interim President of Venezuela, dated January 23, 2019.

4. Attached as **Exhibit 2** is a true and correct copy of the U.S. Department of State press release, titled “United States Continues to Recognize Interim President Guaidó and the National Assembly in Venezuela,” dated January 5, 2021.

5. Attached as **Exhibit 3** is a true and correct copy of the U.S. Trade Representative press release, titled “Statement from USTR Spokesperson Adam Hodge on U.S. Action to Prevent Maduro Regime’s Attempt to Undermine U.S. Sanctions,” dated March 26, 2021.

6. Attached as **Exhibit 4** is a true and correct copy of the U.S. Department of State press release, titled “Venezuela’s Flawed November 21 Elections,” dated November 22, 2021.

7. Attached as **Exhibit 5** is a true and correct copy of the U.S. Department of State’s department press briefing, dated Jan. 4, 2022, reaffirming the U.S. recognition of the Interim Government.

8. Attached as **Exhibit 6** is a true and correct copy of the U.S. Department of State press release, titled “Statement by Secretary Pompeo: An Unfair, Unfree Vote in Venezuela,” dated May 21, 2018.

9. Attached as **Exhibit 7** is a true and correct copy of a CNN article, titled “European nations recognize Juan Guaido as Venezuela’s interim president,” dated February 4, 2019.

10. Attached as **Exhibit 8** is a true and correct copy of the U.S. Department of State fact sheet, titled “Nicolás Maduro: Corruption and Chaos in Venezuela,” dated April 15, 2019.

11. Attached as **Exhibit 9** is a true and correct copy of the U.S. Department of State press release, titled “Venezuela’s Interim Government and the 2015 National Assembly,” dated January 3, 2023, recognizing Venezuela’s 2015 National Assembly as the last remaining democratic institution in Venezuela.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: June 13, 2023

Respectfully submitted,

s/ Claire A. DeLelle
Claire A. DeLelle